

March 16, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
Room 1061  
5630 Fishers Lane  
Rockville, MD 20852

Re: INSTITUTE OF PACKAGING PROFESSIONALS  
Response to  
REQUEST FOR COMMENTS:  
Premarket Notification for Food Contact Substances  
Docket No. **99N-0235**

Dear FDA:

This letter contains the comments of the INSTITUTE OF PACKAGING PROFESSIONALS, 481 Carlisle Drive Herndon, Virginia 20170-4823, ("IoPP") in response to the FDA's recent request for comments on its implementation of the notification process for food contact substances announced in the February 22, 1999 Federal Register (64 FR 8577).

About IoPP

IoPP is a not-for-profit, educational trade organization for packaging professionals. It is the largest membership organization of its kind, with more than 6,000 members, including personnel from companies that manufacture machinery and materials, convert materials into packaging forms, design package forms, oversee packaging and distribution related operations, and others.

General Comments

IoPP urges FDA to implement the notification process for food contact substances as quickly as possible, and to urge Congress to appropriate the statutorily requisite funding for this purpose.

Predictable timing for approval of new food contact substances would be one of the single most important advances in product planning and packaging development productivity in many years.

99N-0235

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16 March 1999

Page Two

Specific Comments

Specifically in response to some of the subjects listed in FDA's February 22, 1999 Federal Register notice:

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(2) The application of the requirements of the National Environmental Policy Act (NEPA) to the notification process

Notifications, as they will be substantially similar in nature to currently submitted Food Additive Petitions, and will address similar subject matter, should be the subject of the same categorical exclusion for environmental assessments.

(3) The confidentiality of third-party information submitted in support of notifications

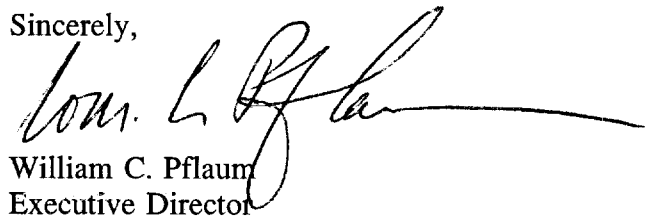
Validly trade secret or confidential company information, whether the notifier's or some other company's, should be maintained confidential within the context of the notification process. IoPP can see no reason any different rule should apply. IoPP supports any appropriate mechanism to achieve this result.

(4) FDA's proposed requirements and recommendations on the content of notifications

IoPP believes the same content and safety data requirements currently in place for food additives generally should apply to the notification process as well, except as may be needed to adapt the process to differing procedures (such as FDA sending acknowledgment of receipt and indicating the calculated end-date).

Thank you very much for this opportunity to comment. Please let us know if there is additional information which we may supply for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Wm. C. Pflaum", with a long horizontal flourish extending to the right.

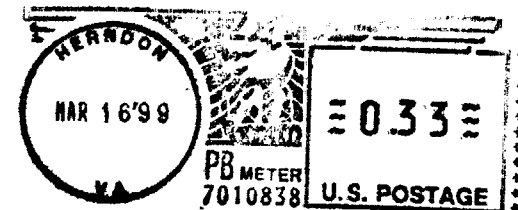
William C. Pflaum  
Executive Director



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*Packaging  
Matters!*

FIRST  
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